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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ;
LICETH DEMHA-SANTIAGO; JUAN
DEMHA; DOES I THROUGH X; AND
ROE CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**STIPULATION AND
ORDER TO CONTINUE TRIAL (FIRST
REQUEST)**

ALL RELATED MATTERS

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court continue trial in the above-captioned matter to accommodate a private mediation with Ret. Judge Jennifer Togliatti on February 22, 2023.

A. Reasons For the Continuance

The parties have been discussing the potential for alternative resolution prior to trial. The case was not referred for a settlement conference in front of a United States Magistrate Judge as seems to be the usual course following the filing of a Proposed Joint Pre-Trial Order. As such, the parties discussed other alternative routes to resolution outside of trial.

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1 Recently, the United States of America received approval and agreed to participate in
2 private mediation with Ret. Judge Jennifer Togliatti, with stipulations. Before agreeing to and
3 receiving authority to engage in a private mediation the following circumstances had to be
4 overcome. First, the U.S. Attorney's Office currently only has three AUSAs and three unfilled
5 AUSA positions in the relatively small defensive section of the Civil Division. Second, but
6 relatedly, during the past few months, undersigned defense counsel have been busy in
7 particular with written and deposition discovery, motion practice, hearings, and settlement
8 conferences, responding to new complaints, and getting up to speed with additional cases
9 and deadlines in cases the undersigned have taken over after other AUSAs left the office.
10 Third, the Deputy Civil Chief for the Defensive Section of the Civil Division departed. This
11 departure required additional time for the undersigned AUSAs to recommend to and receive
12 approval from management at the U.S Attorney's Office to mediate the case. And finally, the
13 U.S. Attorney's Office encountered funding issues due to the end of the Federal
14 Government's fiscal year; there are typically several weeks during September–October during
15 which the office cannot obligate funds for such things as retaining an expert or private
16 mediator. Once the foregoing issues were overcome, the United States was able to agree to
17 participate in a private mediation as described above. However, the soonest that Judge Togliatti
18 has available to mediate this case is February 22, 2023. The parties have already reserved said
19 date, pending a continuance of trial, which is set for January 23, 2023.

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B. Proposed Trial Dates

The parties have discussed their availability for trial after the mediation on February 22, 2023. The following are alternative dates to schedule trial: **April 10, 2023, April 17, 2023, or May 15, 2023.**

DATED this 15th day of November 2022.

DATED this 15th day of November 2022.

MAINOR WIRTH, LLP

UNITED STATES DISTRICT ATTORNEY

/s/ Ash Marie Blackburn

/s/ Skyler Pearson

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DATED this 15th day of November 2022.

HALL JAFFE & CLAYTON, LLP

/s/ Jan K. Tomasik

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Re: Wilson v. United States of America, et al.

2:18-CV-01241-JCM-NJK

[Proposed] Stipulation and Order to Continue Trial (First Request)

IT IS SO ORDERED that the trial currently set for January 23, 2023 be continued to **April 10, 2023, at 9:00 a.m.**; and the Calendar Call currently set for January 18, 2023, at 1:30 p.m., be continued to **April 5, 2023, at 1:30 p.m.**

ORDER

DATED November 21, 2022.


UNITED STATES DISTRICT JUDGE

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